

EPA

March 2006

RCRAInfo CM&E EVALUATION – VIOLATION FORM

*EPA ID Number		PAD982363889			EIN		
Handler Name		Norquay Technology Incorporated					
Street		800 West Front Street					
City		Chester		State	PA	Zip Code	19013
Actual Generator Status <i>Check only if different from Notified Status.</i>				LQG <input type="checkbox"/> SQG <input type="checkbox"/> CESQG <input type="checkbox"/> Closed <input type="checkbox"/> Non-Handler <input type="checkbox"/>			
Universe Change Required? <i>(Generator Status Change Required)</i>		YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> If YES, complete the Universe Change Section (on reverse side of this form).					
RCRA Non-Notifier?		YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> If YES, complete the Handler Section (on reverse side of this form).					
Other Facility Information Changes?		YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> If YES, complete the Handler Section (on reverse side of this form).					
*EVALUATION		<input checked="" type="checkbox"/> Add		<input type="checkbox"/> Update		<input type="checkbox"/> Delete	
You must provide an Evaluation Identifier (also known as the Sequence Number).							
*Evaluation Identifier	*Type	*Evaluation Start Date (mm/dd/yyyy)		*Agency	Responsible Person	Suborganization	
	FUI	09/12/2007		S	CDS	PADEP Wm	
Day Zero (mm/dd/yyyy): You need to specify Day Zero for all evaluation types except CDI, CSE, FUI, SNY, and SNN, otherwise it defaults to Evaluation Start Date. For CDI, CSE, FUI, and SNY evaluations, you must select a previous CEI Start Date for the Day Zero. SNN evaluation type does not require a Day Zero.				10/12/2006		Reclassified SV Date: Only applicable for SNY evaluation type as appropriate.	
Notes: All outstanding violations corrected, nothing should remain open for this facility for all inspections since 10/12/2006							
Evaluation Indicator Field (Check all that apply)							
<input type="checkbox"/> Citizen Complaint <input type="checkbox"/> Multimedia Inspection <input type="checkbox"/> Sampling <input type="checkbox"/> Not Subtitle C							
Focused Coverage Areas (Use Only for Evaluation Type FCI)							
<i>Regulation-Specific FCI</i>							
BIF <input type="checkbox"/> CCI <input type="checkbox"/> CFI <input type="checkbox"/> INC <input type="checkbox"/> LDR <input type="checkbox"/> PTB <input type="checkbox"/> PTX <input type="checkbox"/>							
THI <input type="checkbox"/> UIC <input type="checkbox"/> UOI <input type="checkbox"/> UWR <input type="checkbox"/> OTHER (specify): _____							
<i>Routine/Standardized FCI</i>							
CAR <input type="checkbox"/> CPC <input type="checkbox"/> DOS <input type="checkbox"/> EMR <input type="checkbox"/> IEI <input type="checkbox"/> ISI <input type="checkbox"/> RTI <input type="checkbox"/>							
Does this Evaluation Add/Update/Delete a Violation?				YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>		If Yes, fill in the Violations Section(s) on page 2 of this form.	
Does this Evaluation link to a Commitment?				YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>		If Yes, please use the RCRAInfo 3007 Information Requests and Commitments Form.	
Does this Evaluation link to a 3007 Request?				YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>		If Yes, please use the RCRAInfo 3007 Information Requests and Commitments Form.	
OUTSTANDING VIOLATIONS COVERED BY ABOVE EVALUATION? YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> If Yes, fill in information below.							
*Seq. No.	*Violation Type	*Agency	*Regulation Citation (Type + Citation) (ex. FR 262.1)			*Date Determined (mm/dd/yyyy)	

*Required Fields

EPA ID Number				Handler Name			
PAD982363889				Norquay Technology Incorporated			
VIOLATIONS SECTION (Additional Violations can be added/updated/deleted using the RCRAInfo CM&E Additional Violations Form)							
VIOLATION <input type="checkbox"/> Add <input checked="" type="checkbox"/> Update <input type="checkbox"/> Delete						Link to Above Evaluation <input type="checkbox"/>	
Seq. No	Violation Type	Agency	Determined Date (mm/dd/yyyy)	Return to Compliance (RTC) Qualifier		Actual RTC Date (mm/dd/yyyy)	
	XSS	S	10/12/2007 b	<input type="radio"/> A RTC Qualifier is required if entering an Actual RTC Date.		9/12/2007	
Notes: Corrected leak in roof, rainwater is no longer allowed to mix with chemicals spilled on the warehouse floor							
LINK CITATIONS TO ABOVE VIOLATION?				YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>		If Yes, fill in information below	
Citation Type		Citation		Citation Type		Citation	
SS		6018.610(1)					
VIOLATION <input type="checkbox"/> Add <input checked="" type="checkbox"/> Update <input type="checkbox"/> Delete						Link to Above Evaluation <input type="checkbox"/>	
Seq. No	Violation Type	Agency	Determined Date (mm/dd/yyyy)	Return to Compliance (RTC) Qualifier		Actual RTC Date (mm/dd/yyyy)	
	XSS	S	10/12/2007	<input type="radio"/> A RTC Qualifier is required if entering an Actual RTC Date.		8/10/2007	
Notes:							
LINK CITATIONS TO ABOVE VIOLATION?				YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>		If Yes, fill in information below	
Citation Type		Citation		Citation Type		Citation	
SS		SWMA 6018.403(b)(2)					
HANDLER SECTION (Fill out if RCRA Non-Notifier)							
Handler Name				Contact			
Street							
City				State	Zip Code		
County							
UNIVERSE CHANGE SECTION (Fill out if Universe Change Required)							
i. Indicate the Facility's current Universe(s):							
ii. Indicate the new RCRAInfo Generator Universe: <i>Note: All TSD activity changes must be handled by the IOR and cannot be made using this form.</i>				LQG <input type="checkbox"/> SQG <input type="checkbox"/> CEG <input type="checkbox"/> Non-Handler <input type="checkbox"/> Closed <input type="checkbox"/>			
iii. Indicate the new transporter status: (Only fill out if the facility requires a transporter status change)				Transporter <input type="checkbox"/> <i>If the transporter box is checked, you must check at least one mode of transportation below:</i> <input type="checkbox"/> Air <input type="checkbox"/> Water <input type="checkbox"/> Rail <input type="checkbox"/> Other <input type="checkbox"/> Highway		Non-Transporter <input type="checkbox"/> Check non-transporter if the facility is currently listed in RCRAInfo as a transporter AND no longer transports hazardous waste.	

*Required Fields

Department of Environmental Protection	GENERAL INSPECTION REPORT	Bureau of Land Recycling and Waste Management
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Type of Inspection Follow-up	WM Identification Number PAD982363889	Entry Time/Date 13:45 09/12/2007	Exit Time/Date 15:10 09/12/2007
Facility/Incident Name and Location Norquay Technology Incorporated 800 West Front Street			Municipality Chester City County Delaware
Name, Address of Responsible Official Mr. Robert W. Heldt		Title President	
Person Interviewed SAA, Mr. James Kauer, Mr. George Dennis		Telephone (610)-874-4330	Interviewed Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

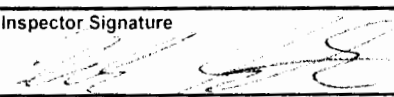
REMARKS: See Inspection Report Comments

On September 12, 2007, Jonathon Lorio and I (Clark Smith) conducted a follow-up large quantity hazardous waste generator and large quantity residual waste generator inspections of Norquay Technology Incorporated located at 800 W Front Street, Chester, PA 19016 in Chester City, Delaware County. The follow-up inspection is in response to routine and follow-up inspections conducted on October 12, 2006, October 17, 2006, March 21, 2007, May 3, 2007, and August 10, 2007. Mr. Robert W. Heldt and Mr. James Kauer led the Department on the inspection. Mr. George Dennis, Production Personnel, was also interviewed during the inspection.

Norquay Technology Inc. is a batch specialty chemical manufacturer that produces organics and their intermediates, thus generating organic and aqueous waste streams.

The facilities roof has been under repair since the time of the last inspection. Mr. Kauer stated that the roof repair is now structurally complete. During previous inspections, large pools of standing water were observed throughout the entire warehouse floor. No water was observed mixing with floor sweepings on the floor of the warehouse *thereby correcting the violation of the Solid Waste Management Act 6018.610(1)*.

The hazardous waste storage area contained seventeen (17) 55-gallon drums and three (3) 5-gallon pails of hazardous waste, which were stored on containment pallets. A new hazardous waste labeling system, which includes five waste streams, has been implemented. Drums labeled as acidic solution, flammable solvent, flammable chlorinated solvent, corrosive solution, and flammable solid waste were

Inspector Name Clark Smith	Inspector Signature 	Headquarters 2 East Main Street Norristown, PA 19401	Date 09/12/2007
			Telephone 484-250-5763
Person Interviewed Name Mr. Robert W. Heldt, Mr. James Kauer	Signature of Person Interviewed Copy Mailed To Facility	Title President, Engineer	Telephone 610-874-4330

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Department of Environmental Protection	GENERAL INSPECTION REPORT	Bureau of Land Recycling and Waste Management
Facility/Incident Name and Location Norquay Technology Incorporated		Municipality Chester City
Follow-up		County Delaware

observed. All hazardous waste drums in the main storage area were observed to be properly labeled, dated, and closed.

Approximately thirty (30) drums, which were acknowledged by facility staff to be residual waste, were observed without a label stating "residual waste" during the last inspection. It was observed that all residual waste drums at the facility have now been properly labeled, *thereby correcting the violation of PA Code 299.121(d)*.


Seven (7) 55-gallon hazardous waste drums were observed in satellite accumulation outside of the reactor room. All drums were properly labeled and closed. The oldest drum was dated on September 11, 2007. Mr. Heldt stated that drums will continue to be moved from satellite accumulation to the main storage area in a timely fashion.

Additional waste pails to account for numerous waste streams have been added to the laboratory. The pails were properly labeled and closed. The labels have now been placed on the side of the pail that is not being actively added to. This was done in accordance with a Department recommendation to avoid defacing the labels during addition of waste.

Hazardous waste manifests were not reviewed during this inspection. No reporting, weekly inspections, training records, ect. were observed during this inspection.

All outstanding violations have been corrected.

No violations observed.

Inspector Name Clark D. Smith	Inspector Signature 	Date 09/12/2007
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March 2006

RCRAInfo CM&E EVALUATION – VIOLATION FORM

*EPA ID Number		PAD982363889			EIN		
Handler Name		Norquay Technology Incorporated					
Street		800 West Front Street					
City		Chester		State	PA	Zip Code	19013
Actual Generator Status <small>Check only if different from Notified Status.</small>				LQG <input type="checkbox"/> SQG <input type="checkbox"/> CESQG <input type="checkbox"/> Closed <input type="checkbox"/> Non-Handler <input type="checkbox"/>			
Universe Change Required? <small>(Generator Status Change Required)</small>		YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> If YES, complete the Universe Change Section (on reverse side of this form).					
RCRA Non-Notifier?		YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> If YES, complete the Handler Section (on reverse side of this form).					
Other Facility Information Changes?		YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> If YES, complete the Handler Section (on reverse side of this form).					
*EVALUATION		<input checked="" type="checkbox"/> Add		<input type="checkbox"/> Update		<input type="checkbox"/> Delete	
You must provide an Evaluation Identifier (also known as the Sequence Number).							
*Evaluation Identifier	*Type	*Evaluation Start Date (mm/dd/yyyy)		*Agency	Responsible Person	Suborganization	
	FUI	08/10/2007		S	CDS	PADEP um	
Day Zero (mm/dd/yyyy): <small>You need to specify Day Zero for all evaluation types except CDI, CSE, FUI, SNY, and SNN, otherwise it defaults to Evaluation Start Date. For CDI, CSE, FUI, and SNY evaluations, you must select a previous CEI Start Date for the Day Zero. SNN evaluation type does not require a Day Zero.</small>				3/21/2007		Reclassified SV Date: <small>Only applicable for SNY evaluation type as appropriate.</small>	
Notes:							
Evaluation Indicator Field (Check all that apply)							
<input type="checkbox"/> Citizen Complaint <input type="checkbox"/> Multimedia Inspection <input type="checkbox"/> Sampling <input type="checkbox"/> Not Subtitle C							
Focused Coverage Areas (Use Only for Evaluation Type FCI)							
<i>Regulation-Specific FCI</i>							
BIF <input type="checkbox"/> CCI <input type="checkbox"/> CFI <input type="checkbox"/> INC <input type="checkbox"/> LDR <input type="checkbox"/> PTB <input type="checkbox"/> PTX <input type="checkbox"/>							
THI <input type="checkbox"/> UIC <input type="checkbox"/> UOI <input type="checkbox"/> UWR <input type="checkbox"/> OTHER (specify): _____							
<i>Routine/Standardized FCI</i>							
CAR <input type="checkbox"/> CPC <input type="checkbox"/> DOS <input type="checkbox"/> EMR <input type="checkbox"/> IEI <input type="checkbox"/> ISI <input type="checkbox"/> RTI <input type="checkbox"/>							
Does this Evaluation Add/Update/Delete a Violation?				YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>		If Yes, fill in the Violations Section(s) on page 2 of this form.	
Does this Evaluation link to a Commitment?				YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>		If Yes, please use the RCRAInfo 3007 Information Requests and Commitments Form.	
Does this Evaluation link to a 3007 Request?				YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>		If Yes, please use the RCRAInfo 3007 Information Requests and Commitments Form.	
OUTSTANDING VIOLATIONS COVERED BY ABOVE EVALUATION? YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> If Yes, fill in information below.							
*Seq. No.	*Violation Type	*Agency	*Regulation Citation (Type + Citation) <small>(ex. FR 262.1)</small>			*Date Determined (mm/dd/yyyy)	
22	XSS	S	SS 6018.610(1)			05/03/2007	
15	XXS	S	SS 6018.610(1)				
16	XXS	S	SS 6018.610(1)				

*Required Fields

EPA ID Number				Handler Name			
PAD982363889				Norquay Technology Incorporated			
VIOLATIONS SECTION (Additional Violations can be added/updated/deleted using the RCRAInfo CM&E Additional Violations Form)							
VIOLATION <input type="checkbox"/> Add <input checked="" type="checkbox"/> Update <input type="checkbox"/> Delete						Link to Above Evaluation <input type="checkbox"/>	
Seq. No	Violation Type	Agency	Determined Date (mm/dd/yyyy)	Return to Compliance (RTC) Qualifier		Actual RTC Date (mm/dd/yyyy)	
	SS	S	5/3/2007	<input type="radio"/> A RTC Qualifier is required if entering an Actual RTC Date.		8/10/2007	
Notes: Generic label is used for all hazardous waste drums indicating (acetone, toluene, xylene)							
LINK CITATIONS TO ABOVE VIOLATION?				YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>		If Yes, fill in information below	
Citation Type		Citation		Citation Type		Citation	
SS		6018.403(b)(2)					
VIOLATION <input checked="" type="checkbox"/> Add <input type="checkbox"/> Update <input type="checkbox"/> Delete						Link to Above Evaluation <input type="checkbox"/>	
Seq. No	Violation Type	Agency	Determined Date (mm/dd/yyyy)	Return to Compliance (RTC) Qualifier		Actual RTC Date (mm/dd/yyyy)	
	262.C	S	8/10/2007	<input type="radio"/> A RTC Qualifier is required if entering an Actual RTC Date.		8/10/2007	
Notes: Drum held in storage at satellite accumulation point for longer than 3 days after filled to capacity							
LINK CITATIONS TO ABOVE VIOLATION?				YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>		If Yes, fill in information below	
Citation Type		Citation		Citation Type		Citation	
FR		262.34(c)(2)					
HANDLER SECTION (Fill out if RCRA Non-Notifier)							
Handler Name				Contact			
Street							
City				State	Zip Code		
County							
UNIVERSE CHANGE SECTION (Fill out if Universe Change Required)							
i. Indicate the Facility's current Universe(s):							
ii. Indicate the new RCRAInfo Generator Universe: <small>Note: All TSD activity changes must be handled by the IOR and cannot be made using this form.</small>				LQG <input type="checkbox"/> SQG <input type="checkbox"/> CEG <input type="checkbox"/> Non-Handler <input type="checkbox"/> Closed <input type="checkbox"/>			
iii. Indicate the new transporter status: (Only fill out if the facility requires a transporter status change)				Transporter <input type="checkbox"/> <small>If the transporter box is checked, you must check at least one mode of transportation below:</small> <input type="checkbox"/> Air <input type="checkbox"/> Water <input type="checkbox"/> Rail <input type="checkbox"/> Other <input type="checkbox"/> Highway		Non-Transporter <input type="checkbox"/> Check non-transporter if the facility is currently listed in RCRAInfo as a transporter AND no longer transports hazardous waste.	

*Required Fields

February 2006

RCRAINFO CM&E ADDITIONAL VIOLATIONS FORM

(Attach to RCRAinfo CM&E Evaluation – Violation Form, if appropriate)

EPA ID Number		Handler Name	
PAD982363889		Norquay Technology Incorporated	

VIOLATION <input checked="" type="checkbox"/> Add <input type="checkbox"/> Update <input type="checkbox"/> Delete			Link to Above Evaluation <input type="checkbox"/>
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Seq. No	Violation Type	Agency	Determined Date (mm/dd/yyyy)	Return to Compliance (RTC) Qualifier	Actual RTC Date (mm/dd/yyyy)
	262.C	S	8/10/2007	<input type="radio"/> A RTC Qualifier is required if entering an Actual RTC Date.	8/10/2007

Notes: Haz Waste Container was unlabeled and not dated to indicate accumulation start date

LINK CITATIONS TO ABOVE VIOLATION?		YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	If Yes, fill in information below
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Citation Type	Citation	Citation Type	Citation
FR	262.34(a)(2)		
FR	262.34(a)(3)		

VIOLATION <input checked="" type="checkbox"/> Add <input checked="" type="checkbox"/> Update <input type="checkbox"/> Delete			Link to Above Evaluation <input type="checkbox"/>
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Seq. No	Violation Type	Agency	Determined Date (mm/dd/yyyy)	Return to Compliance (RTC) Qualifier	Actual RTC Date (mm/dd/yyyy)
16	XSS	S	70/12/06	<input type="radio"/> A RTC Qualifier is required if entering an Actual RTC Date.	8/10/08

Notes:

LINK CITATIONS TO ABOVE VIOLATION?		YES <input type="checkbox"/> NO <input type="checkbox"/>	If Yes, fill in information below
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Citation Type	Citation	Citation Type	Citation

VIOLATION <input type="checkbox"/> Add <input type="checkbox"/> Update <input type="checkbox"/> Delete			Link to Above Evaluation <input type="checkbox"/>
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Seq. No	Violation Type	Agency	Determined Date (mm/dd/yyyy)	Return to Compliance (RTC) Qualifier	Actual RTC Date (mm/dd/yyyy)
				<input type="checkbox"/> A RTC Qualifier is required if entering an Actual RTC Date.	

Notes:

LINK CITATIONS TO ABOVE VIOLATION?		YES <input type="checkbox"/> NO <input type="checkbox"/>	If Yes, fill in information below
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Citation Type	Citation	Citation Type	Citation

Department of Environmental Protection		GENERAL INSPECTION REPORT		Bureau of Land Recycling and Waste Management	
Type of Inspection	WM Identification Number	Entry Time/Date		Exit Time/Date	
Follow-up	PAD982363889	08/10/2007		08/10/2007	
Facility/Incident Name and Location				Municipality	
Norquay Technology Incorporated				Chester City	
800 West Front Street				County	
				Delaware	
Name, Address of Responsible Official			Title		
Mr. Robert W. Heldt			President		
Person Interviewed			Telephone	Interviewed	
Mr. James Kauer, Mr. George Dennis, Mr. William J. Kesack, Mr. Peter Litak			(610)-874-4330	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
REMARKS: See Inspection Report Comments					

On August 10, 2007, I (Clark Smith) conducted a follow-up large quantity hazardous waste generator and large quantity residual waste generator inspections of Norquay Technology Incorporated located at 800 W Front Street, Chester, PA 19016 in Chester City, Delaware County. The follow-up inspection is in response to routine inspections conducted on October 12, 2006, October 17, 2006, March 21, 2007, and a follow-up inspection on May 3, 2007. Mr. James Kauer led the Department on the inspection. Mr. George Dennis, Production Personnel; Mr. William J. Kesack, Environmental Compliance Consultant; and Mr. Peter Litak, Chemist, were also interviewed during the inspection.

Norquay Technology Inc. is a batch specialty chemical manufacturer that produces organics and their intermediates, thus generating organic and aqueous waste streams.

The facilities roof has been under repair since the time of the last inspection. Mr. Kauer stated that the repair work is scheduled to be completed by the end of August or the beginning of September. The roof is repaired in a manner to allow the roof to be closed at the end of each workday. Chemicals, that are stored underneath the areas of the roof that leak, are covered with tarps for protection. Standing water on the warehouse floor, which results from the defective roof, is collected via a floor scrubber and vacuum. During this inspection, large pools of standing water were observed throughout the entire warehouse floor. Rainwater still comes into contact with various chemicals on the warehouse floor **contrary to the Solid Waste Management Act 6018.610(1)**. This violation was also observed during the October 12, 2006 inspection, the March 21, 2007 inspection, and the May 3, 2007 inspection. The facility has demonstrated an

Inspector Name	Inspector Signature	Headquarters	Date
Clark Smith		2 East Main Street Norristown, PA 19401	08/15/2007
			Telephone
			484-250-5763
Person Interviewed Name	Signature of Person Interviewed	Title	Telephone
Mr. James Kauer	Copy Mailed To Facility	Engineer	610-874-4330

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Department of Environmental Protection	GENERAL INSPECTION REPORT	Bureau of Land Recycling and Waste Management
Facility/Incident Name and Location Norquay Technology Incorporated		Municipality Chester City
Follow-up		County Delaware

effort to correct this violation. The roof work was observed during this inspection and it was evident that contractors are actively working on the project.

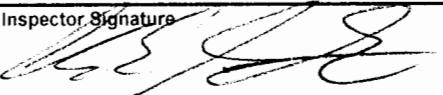
The vacuum "knuche" has been removed from the vacuum room. Unidentified oils and chemicals were observed to be mixing with water on the floor of the vacuum room during previous inspections. No standing water or chemicals were observed on the floor during this inspection. The hazardous waste oil drum in satellite accumulation remains within the vacuum room. The waste oil drum contains oil that possibly comes into contact with hazardous fumes. Due to this possibility, the waste oil is handled as a hazardous waste instead of a residual waste. The vacuum room remains on the weekly inspection checklist.

The hazardous waste storage area contained eight (8) 55-gallon drums of hazardous waste, which were stored on containment pallets. Five (5) of the hazardous waste drums were observed to be unlabeled. Storage of hazardous waste without a label stating "hazardous waste" is **contrary to 40 C.F.R. 262.34(a)(3)**. Storage of hazardous waste without clearly marking the date upon which each period of accumulation begins is **contrary to 40 C.F.R. 262.34(a)(2)**. These violations were also observed during the March 21, 2007 inspection. *A hazardous waste label indicating the accumulation start time was placed on all unlabeled drums, thereby immediately correcting these violations.* During previous inspections, a generic hazardous waste label indicating toluene, acetone, and xylene that did not accurately identify all of the facilities waste streams was used on all waste drums. A new hazardous waste labeling system, which includes five waste streams, has been implemented *correcting the violation of the Solid Waste Management Act 6018.403(b)(2)*. The amount of unidentified material drums in the warehouse has again significantly decreased since the last inspection.

Approximately thirty (30) drums, which were acknowledged by facility staff to be residual waste, were observed without a label stating "residual waste". Storing residual waste in a container that is not labeled as "residual waste" or as the specific type of "waste" is **contrary to PA Code 299.121(d)**.

Four (4) 55-gallon hazardous waste drums were observed in satellite accumulation at the reactor room. All drums were properly labeled and closed. The oldest drum was dated on July 17, 2007. All of the drums were filled to capacity, but had not yet been moved to the hazardous waste storage area. These drums have been stored in the satellite accumulation area for longer than 72 hours after being filled and closed **contrary to 40 C.F.R. 262.34(c)(2)**. *These drums were moved into the 90-day hazardous waste storage area during the inspection, thereby immediately correcting this violation.*

Additional waste pails to account for numerous waste streams have been added to the laboratory. The pails were properly labeled and closed. **It is recommended that the labels be applied to the side of the pails where addition of waste does not occur to avoid defacing the label. Additionally, a funnel should be implemented in the waste addition process to avoid spill-over from the pails.**

Inspector Name Clark D. Smith	Inspector Signature 	Date 02/15/2007
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Department of Environmental Protection	GENERAL INSPECTION REPORT	Bureau of Land Recycling and Waste Management
Facility/Incident Name and Location Norquay Technology Incorporated		Municipality Chester City
Follow-up		County Delaware

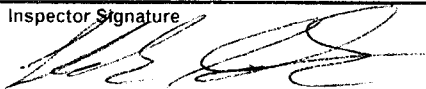
During the last inspection, observation of the pH neutralization room revealed a substance leaking from the pipe connected to the pH neutralization tank. The substance was white in color and was observed on the tanks containment pallet, as well as the floor. Mr. Peter Litak, Chemist, stated that the discharged substance was "sulfanate." The tank has been repaired and the waste material has been removed, thereby *correcting the violation of the Solid Waste Management Act 6018.610(1).*

No hazardous waste manifest discrepancies were noted. The facility continues to ship hazardous waste off-site approximately once per week. Typically eighty eight (88) 55-gallon drums are shipped off-site per week.

Five (5) violations noted. Three (3) violations were immediately corrected at the time of the inspection, but have been observed numerous times during the past 5 inspections. One (1) violation has been responded to, but has not been corrected at this time.

Within fourteen (14) days of the receipt of this report, Norquay Technology Inc. should submit to the Department a schedule and plan detailing what actions the facility has taken to correct and prevent the violations noted.

A follow-up inspection of Norquay Technology Inc. will be conducted on or about September 5, 2007, to determine Norquay Technology's compliance with the Department's Rules and Regulations.

Inspector Name Clark D. Smith	Inspector Signature 	Date 08/15/2007
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RCRAInfo CM&E EVALUATION – VIOLATION FORM

*EPA ID Number		PAD982363889			EIN		
Handler Name		Norquay Technology Incorporated					
Street	800 West Front Street						
City	Chester	State	PA	Zip Code	19013		
Actual Generator Status <i>Check only if different from Notified Status.</i>		LQG <input type="checkbox"/>		SQG <input type="checkbox"/>	CESQG <input type="checkbox"/>	Closed <input type="checkbox"/>	Non-Handler <input type="checkbox"/>
Universe Change Required? <i>(Generator Status Change Required)</i>		YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> If YES, complete the Universe Change Section (on reverse side of this form).					
RCRA Non-Notifier?		YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> If YES, complete the Handler Section (on reverse side of this form).					
Other Facility Information Changes?		YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> If YES, complete the Handler Section (on reverse side of this form).					
*EVALUATION		<input checked="" type="checkbox"/> Add		<input type="checkbox"/> Update	<input type="checkbox"/> Delete	You must provide an Evaluation Identifier (also known as the Sequence Number).	
*Evaluation Identifier	*Type	*Evaluation Start Date (mm/dd/yyyy)	*Agency	Responsible Person	Suborganization		
	CEI	03/21/2007	S	CDS	PADEP		
Day Zero (mm/dd/yyyy): You need to specify Day Zero for all evaluation types except CDI, CSE, FUI, SNY, and SNN, otherwise it defaults to Evaluation Start Date. For CDI, CSE, FUI, and SNY evaluations, you must select a previous CEI Start Date for the Day Zero. SNN evaluation type does not require a Day Zero.			Reclassified SV Date: Only applicable for SNY evaluation type as appropriate.				
Notes:							
Evaluation Indicator Field (Check all that apply) <input type="checkbox"/> Citizen Complaint <input type="checkbox"/> Multimedia Inspection <input type="checkbox"/> Sampling <input type="checkbox"/> Not Subtitle C							
Focused Coverage Areas (Use Only for Evaluation Type FCI) <i>Regulation-Specific FCI</i> BIF <input type="checkbox"/> CCI <input type="checkbox"/> CFI <input type="checkbox"/> INC <input type="checkbox"/> LDR <input type="checkbox"/> PTB <input type="checkbox"/> PTX <input type="checkbox"/> THI <input type="checkbox"/> UIC <input type="checkbox"/> UOI <input type="checkbox"/> UWR <input type="checkbox"/> OTHER (specify): _____ <i>Routine/Standardized FCI</i> CAR <input type="checkbox"/> CPC <input type="checkbox"/> DOS <input type="checkbox"/> EMR <input type="checkbox"/> IEI <input type="checkbox"/> ISI <input type="checkbox"/> RTI <input type="checkbox"/>							
Does this Evaluation Add/Update/Delete a Violation?		YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>		If Yes, fill in the Violations Section(s) on page 2 of this form.			
Does this Evaluation link to a Commitment?		YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>		If Yes, please use the RCRAInfo 3007 Information Requests and Commitments Form.			
Does this Evaluation link to a 3007 Request?		YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>		If Yes, please use the RCRAInfo 3007 Information Requests and Commitments Form.			
OUTSTANDING VIOLATIONS COVERED BY ABOVE EVALUATION?		YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>		If Yes, fill in information below.			
*Seq. No.	*Violation Type	*Agency	*Regulation Citation (Type + Citation) (ex. FR 262.1)			*Date Determined (mm/dd/yyyy)	

*Required Fields

EPA ID Number				Handler Name			
PAD982363889				Norquay Technology Incorporated			
VIOLATIONS SECTION (Additional Violations can be added/updated/deleted using the RCRAInfo CM&E Additional Violations Form)							
VIOLATION <input checked="" type="checkbox"/> Add <input type="checkbox"/> Update <input type="checkbox"/> Delete						Link to Above Evaluation <input type="checkbox"/>	
Seq. No	Violation Type	Agency	Determined Date (mm/dd/yyyy)	Return to Compliance (RTC) Qualifier		Actual RTC Date (mm/dd/yyyy)	
	265.I	S	3/21/2007	<input type="checkbox"/> A RTC Qualifier is required if entering an Actual RTC Date.		3/21/2007	
Notes:							
LINK CITATIONS TO ABOVE VIOLATION?				YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>		If Yes, fill in information below	
Citation Type		Citation		Citation Type		Citation	
FR		265.171					
VIOLATION <input checked="" type="checkbox"/> Add <input type="checkbox"/> Update <input type="checkbox"/> Delete						Link to Above Evaluation <input type="checkbox"/>	
Seq. No	Violation Type	Agency	Determined Date (mm/dd/yyyy)	Return to Compliance (RTC) Qualifier		Actual RTC Date (mm/dd/yyyy)	
	265.I	S	3/21/2007	<input type="checkbox"/> A RTC Qualifier is required if entering an Actual RTC Date.		3/21/2007	
Notes:							
LINK CITATIONS TO ABOVE VIOLATION?				YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>		If Yes, fill in information below	
Citation Type		Citation		Citation Type		Citation	
FR		265.173(a)					
HANDLER SECTION (Fill out if RCRA Non-Notifier)							
Handler Name				Contact			
Street							
City				State	Zip Code		
County							
UNIVERSE CHANGE SECTION (Fill out if Universe Change Required)							
i. Indicate the Facility's current Universe(s):							
ii. Indicate the new RCRAInfo Generator Universe: <i>Note: All TSD activity changes must be handled by the IOR and cannot be made using this form.</i>				LQG <input type="checkbox"/> SQG <input type="checkbox"/> CEG <input type="checkbox"/> Non-Handler <input type="checkbox"/> Closed <input type="checkbox"/>			
iii. Indicate the new transporter status: (Only fill out if the facility requires a transporter status change)				Transporter <input type="checkbox"/> <i>If the transporter box is checked, you must check at least one mode of transportation below:</i> <input type="checkbox"/> Air <input type="checkbox"/> Water <input type="checkbox"/> Rail <input type="checkbox"/> Other <input type="checkbox"/> Highway		Non-Transporter <input type="checkbox"/> Check non-transporter if the facility is currently listed in RCRAInfo as a transporter AND no longer transports hazardous waste.	

*Required Fields

RCRAINFO CM&E ADDITIONAL VIOLATIONS FORM*(Attach to RCRAInfo CM&E Evaluation – Violation Form, if appropriate)*

EPA ID Number	Handler Name
PAD982363889	Norquay Technology Incorporated

VIOLATION <input checked="" type="checkbox"/> Add <input type="checkbox"/> Update <input type="checkbox"/> Delete	Link to Above Evaluation <input type="checkbox"/>
--	--

Seq. No	Violation Type	Agency	Determined Date (mm/dd/yyyy)	Return to Compliance (RTC) Qualifier	Actual RTC Date (mm/dd/yyyy)
	262.C	S	3/21/2007	<input type="checkbox"/> A RTC Qualifier is required if entering an Actual RTC Date.	3/21/2007

Notes: Haz Waste Container was unlabeled and not dated to indicate accumulation start date

LINK CITATIONS TO ABOVE VIOLATION?	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	If Yes, fill in information below
---	---	--

Citation Type	Citation	Citation Type	Citation
FR	262.34(a)(2)		
FR	262.34(a)(3)		

VIOLATION <input checked="" type="checkbox"/> Add <input type="checkbox"/> Update <input type="checkbox"/> Delete	Link to Above Evaluation <input type="checkbox"/>
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Seq. No	Violation Type	Agency	Determined Date (mm/dd/yyyy)	Return to Compliance (RTC) Qualifier	Actual RTC Date (mm/dd/yyyy)
	XSS	S	3/21/2007	<input type="checkbox"/> A RTC Qualifier is required if entering an Actual RTC Date.	3/21/2007

Notes: Generic label is used for all hazardous waste drums indicating (acetone, toluene, xylene)

LINK CITATIONS TO ABOVE VIOLATION?	YES <input type="checkbox"/> NO <input type="checkbox"/>	If Yes, fill in information below
---	--	--

Citation Type	Citation	Citation Type	Citation
SS	6018.403(b)(2)		

VIOLATION <input type="checkbox"/> Add <input type="checkbox"/> Update <input type="checkbox"/> Delete	Link to Above Evaluation <input type="checkbox"/>
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Seq. No	Violation Type	Agency	Determined Date (mm/dd/yyyy)	Return to Compliance (RTC) Qualifier	Actual RTC Date (mm/dd/yyyy)
				<input type="checkbox"/> A RTC Qualifier is required if entering an Actual RTC Date.	

Notes:

LINK CITATIONS TO ABOVE VIOLATION?	YES <input type="checkbox"/> NO <input type="checkbox"/>	If Yes, fill in information below
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Citation Type	Citation	Citation Type	Citation



HAZARDOUS WASTE INSPECTION REPORT



GENERATOR



S Q GENERATOR

Company name Norquay Technology IncorporatedEPA I.D. Number PAD982363889

Employer I.D. Number (EIN) _____

Site Address 800 West Front StreetCounty DelawareMunicipality Chester CityZip 19013Name of Inspector Clark D. SmithName & Title of Responsible Official Mr. Bob Heldt, PresidentPerson Interviewed SAA, Mr. Jim KauerTelephone (610) 874-4330

Mailing Address (if different from above) _____

Amount of Hazardous Waste Generated per Month 2200 Pounds _____ Kgs

1. Site Characterization:

STORAGE: ☒ Container ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad Other _____PBR: ☐ Neutralization/WWTP ☐ Reclaim Other _____GENERATOR TREATMENT ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad2. Universal Waste: ☐ Large Quantity Handler ☐ Small Quantity Handler

Universal Waste Types _____

3. Hazardous Waste Transporters:

Transporter Name Republic Environmental ServicesLicense Number PAD982661381Transporter Name Nertru, IncLicense Number MID021087276Transporter Name Norwith TrucksLicense Number PAD146714878

4. Types of hazardous waste generated and destination facility (location & type).

Waste Code	Waste Description	Destination Facility
D001, F003, F005	Wst Flamm Liquid (Acetone, Toluene, Xylene)	Petro Chem Processing 421 Lycaste Rd Detroit, MI 48214 MID980615298
D001, D002	Wst Corrosive Liquids, Flammable Zinc Chloride Solution	" "
D001, D028, F003, F005	Methalyne Chloride	" "
D001, D028, F003, F005	Waste Toxic Liquids, Flammable, Organic, N.O.S. Waste Ethylene Dichloride Solution, Xylene	" "
D002	Waste Hydrochloric Acid, Solution	" "
D001, D021, F002, F003, F005	Waste Chlorobenzene Solution	" "

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name Norquay Technology Inc ID Number PAD982363889 Date 03/21/2007

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
		X		Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
X				Identification Number	262a.10	262.12	H002
X				Authorized transporters only	262a.10	262.12(c)	H003
X				Subsequent notification requirements met	262a.12(b)		H004
X				Proper manifest used	262a.10	262.21	H005
X				Manifests filled out correctly and completely	262a.20		H006
X				Manifests signed and routed properly	262a.23(a)	262.23	H007
		X		Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
	X			SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
	X			SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
X				Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
X				Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
X				Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
X				Specified records retained for three years	262a.10	262.40(c)	H014
X				Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
X				Exception reporting procedures followed	262a.42	262.42	H016
X				Spill reporting procedures followed	262a.10	262.34(d)	H017
X				PPC plan developed and implemented	262a.10	262.34(a)	H018
	X			Special requirements followed for international shipments	262a.10	262.50 262.60	H019
X				Source reduction strategy prepared and available (LQG only)	262a.100		H020
X				Excluded waste complies with exclusionary requirements	261a.4	261.4	H021

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site Name Norquay Technology Inc ID Number PAD982363889 Date 03/21/2007

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
				CONTAINERS (Subchapter I)			
		X		Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
			X	Containers of hazardous waste in good condition	265a.1	265.171	H026
		X		Containers and stored waste compatible	265a.1	265.172	H027
			X	Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
			X	Containers managed to prevent leaks	265a.1	265.173(b)	H029
		X		Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
X				Container storage areas inspected at least weekly	265a.1	265.174	H031
X				Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
X				Proper containment and collection systems in place	265a.179		H033
X				Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
			X	Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
			X	Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
			X	Containers labeled accurately identify contents	SWMA 6018.403(b) (2)		H037



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU WASTE MANAGEMENT

Inspection ID _____

Field Code _____

INSPECTION REPORT – RESIDUAL WASTE GENERATOR

Site I.D.: PAD982363889
 Site Name: Norquay Technology Inc
 Address: 800 West Front Street
Chester, PA 19013
 Municipality: Chester City
 Responsible Official: Mr. Bob Heldt
 Person Interviewed: SAA, Mr. Jim Kauer
 Inspector: Clark D. Smith
 eFACTS ID #: PF _____ SF _____

Telephone #: 610-874-4330
 Operator Name: _____
 Address: _____
 County: Chester
 Title: President
 Title: SAA, Engineer
 Title: Waste Management Specialist

Inspection Date: 03 / 21 / 2007 Type: Routine No. of Violations: 1 Time: _____

Waste Description: _____ Waste Code: _____

Treatment: ☐ Yes ☐ No Type: _____

Type of Storage: ☐ Containers ☐ Tanks ☐ Piles ☐ Impoundments

Disposition: Destination Facility _____

Location: _____ Type: _____

Amount Generated: _____ lb./mo.

Waste Description: _____ Waste Code: _____

Treatment: ☐ Yes ☐ No Type: _____

Type of Storage: ☐ Containers ☐ Tanks ☐ Piles ☐ Impoundments

Disposition: Destination Facility _____

Location: _____ Type: _____

Amount Generated: _____ lb./mo.

Waste Description: _____ Waste Code: _____

Treatment: ☐ Yes ☐ No Type: _____

Type of Storage: ☐ Containers ☐ Tanks ☐ Piles ☐ Impoundments

Disposition: Destination Facility _____

Location: _____ Type: _____

Amount Generated: _____ lb./mo.

Waste Description: _____ Waste Code: _____

Treatment: ☐ Yes ☐ No Type: _____

Type of Storage: ☐ Containers ☐ Tanks ☐ Piles ☐ Impoundments

Disposition: Destination Facility _____

Location: _____ Type: _____

Amount Generated: _____ lb./mo.

Please refer to the Biennial Report for 2006



Site Name Norquay Technology Inc
 ID Number PAD982363889
 Date 03/21/2007

INSPECTION REPORT – RESIDUAL WASTE GENERATOR (Cont'd)

1 - No Violation Observed 2 - Not-Applicable 3 - Not-Determined 4 - Non-Compliance

STATUS				GENERAL REQUIREMENTS	COMMENTS ATTACHED	CHAPTER CITATION	LINE ITEM
1	2	3	4				
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Designated facility: valid permit? Permit Number (PA) PAD002334621	<input type="checkbox"/>	287.6	1
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Biennial report submitted by March 1 of each odd numbered year.	<input type="checkbox"/>	287.52(a)	2
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Written source reduction strategy on file and in effect.	<input type="checkbox"/>	287.53	3
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Waste reduction strategy covers all waste streams.	<input type="checkbox"/>	287.53(b)	4
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Reduction strategy updated every five years or when waste or manufacturing process changes.	<input type="checkbox"/>	287.53(c)	5
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Waste analysis performed: copy on file.	<input checked="" type="checkbox"/>	287.54	6
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Annual analysis or certification of waste submitted to Department and designated facility.	<input type="checkbox"/>	287.54(b)(f)	7
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Chemical analysis updated every five years or when waste or manufacturing process changes.	<input type="checkbox"/>	287.54(g)	8
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Generator record keeping requirements.	<input type="checkbox"/>	287.55	9
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Operation of disposal or processing facility without a permit.	<input type="checkbox"/>	287.101(a)	10
				STORAGE REQUIREMENTS			
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Residual waste not mixed with hazardous waste.	<input type="checkbox"/>	299.111(1)	11
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Waste stored as not to create a safety risk.	<input checked="" type="checkbox"/>	299.111(2)	12
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Residual waste not mixed with special handling waste.	<input type="checkbox"/>	299.111(3)	13
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Waste not blown or otherwise deposited outside storage area.	<input type="checkbox"/>	299.111(4)	14
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Storage area inspected; records available.	<input type="checkbox"/>	299.112(c)	15
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	All waste stored less than one year.	<input type="checkbox"/>	299.113(a)	16
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Equipment maintained in operable condition.	<input type="checkbox"/>	299.114(a)	17
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Equipment cleaning frequencies maintained.	<input type="checkbox"/>	299.114(c)	18
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Vectors controlled and minimized.	<input type="checkbox"/>	299.115	19
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Run on, runoff minimized; storage areas managed in accordance with Clean Streams Law.	<input type="checkbox"/>	299.116(a)(b)	20
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Waste stored to prevent groundwater degradation.	<input type="checkbox"/>	299.116(c)	21
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Sufficient number of properly constructed storage containers.	<input type="checkbox"/>	299.121	22
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Storage containers labeled properly.	<input checked="" type="checkbox"/>	299.121(d)	23
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Storage container height and access requirements.	<input type="checkbox"/>	299.121(e)	24
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Storage tank design standards.	<input checked="" type="checkbox"/>	299.122	25
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Storage tanks labeled properly.	<input type="checkbox"/>	299.122(a)	26
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	No putrescible waste or liquid waste stored in piles.	<input type="checkbox"/>	299.112(d), 299.131(b)	27
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Waste storage pile area properly designed, constructed and maintained.	<input type="checkbox"/>	299.131	28
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Storage pad or liner system properly designed and maintained.	<input type="checkbox"/>	299.132	29
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Proper design and maintenance of leachate and runoff control systems.	<input type="checkbox"/>	299.133	30
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Proper storage and containment of incinerator ash residue.	<input type="checkbox"/>	299.151	31
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Proper storage and containment of friable asbestos containing waste.	<input type="checkbox"/>	299.152	32
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Proper storage and containment of coal ash.	<input type="checkbox"/>	299.153	33
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Proper storage and containment of PCB containing waste material.	<input type="checkbox"/>	299.154	34
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Proper storage of whole and processed tires.	<input type="checkbox"/>	299.155	35
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>		
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>		
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>		
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>		
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>		
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>		
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>		
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>		
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>		
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>		

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of inspection 03 - 21 - 2007 Identification Number PAD982363889Company/Facility/Site Name Norquay Technology Incorporated

On March 21, 2007 Mr. Jason Oseredzuk and I (Clark Smith) conducted routine large quantity hazardous waste generator, and large quantity residual waste generator, inspections of Norquay Technology Incorporated located at 800 Front Street Chester, PA 19016 in Chester City, Delaware County. Mr. Bob Heldt, President, and Mr. Jim Kauer, Engineer, were present during the inspection. Mr. Bill Kesack of IES Consulting communicated during the records review portion of the inspection by way of speaker phone.

Norquay Technology, Inc is a batch specialty chemical manufacturer that produces organics and their intermediates thus generating organic and aqueous waste streams.

Roof repairs have continued at the facility. Mr. Heldt stated that a portion of the roof overtop of the production area was repaired in November. Repairs have ceased recently as a result of inclement winter weather.

The emergency response plan (PPC plan) was reviewed. Since the time of the last inspection the plan has been updated to include the Department's 24-hour emergency phone number for the Southeast Region. Emergency numbers for DELCORA have also been updated. A waste stream analysis has been added to include more specific descriptions of waste storage at the facility. The Department recommended that at least four employees be designated as "First Responders" during the last inspection. The facility responded to this recommendation by reclassifying four employees as "Awareness" trained employees.

Training programs for the facilities employees have been improved since the time of the last inspection. RCRA Labeling Training was completed in the morning of the inspection for eight employees. All remaining employees will be trained later in the week. Additionally, the facility has implemented numerous training programs including Hazardous Communication, Personal Protective Equipment, Forklift, DOT, Chemical Hygiene, and Emergency Response programs. The training programs are administered by IES from Blue Bell, PA.

Observation of the Vacuum room and the adjacent storage room revealed a strong acidic odor. Mr. Kauer stated that the odor is emitted by the vacuum tank while containing acetic acid. A pool of spilled chemicals and water were observed on the floor of the vacuum room. It was evident that the chemicals had overflowed from a containment pallet in the vacuum room. The containment pallet holds water and various oils. The oils accumulate on the top of the water and are the first material to spill to the ground when overfilled. Failure to use such methods and facilities as are necessary to prevent the harmful or hazardous mixing of waste is **contrary to the Solid Waste Management Act 6018.302 (2)**. A grated drain was observed at the back of the room. Mr. Heldt stated that this drain is part of the trench water system at the facility. Water flows from the leaking roof and into the trench water drains. Trench water is pumped out of drains similar to this one at locations throughout the plant. The liquid pumped from the drains is placed into 55-gallon drums and labeled residual waste. It is recommended that the facility take steps to ensure that trench water waste does not come into contact with hazardous materials at any step of the process. The fire extinguisher in the vacuum room had been serviced in June of 2006. Mr. Kauer stated that the extinguishers are serviced in June of every year. The waste oil drum is labeled as a hazardous waste containing toluene, acetone, and xylene. It is recommended that the facility reevaluate the management of the waste oil unless the waste oil is contaminated from the various solvents on-site or other hazardous constituents. This waste stream could potentially be managed as a residual waste if a determination in accordance with 40 CFR 262.11 shows that it is not hazardous waste.

Two 55-gallon drums of raw material heptane were observed in the staging room. Residual chemicals were observed collecting on the top of the drums. The residual chemical had begun to deteriorate the paint of the drum. Four (4) drums of waste toluene were observed outside of the staging area. All of the toluene drums were visibly rusted and deteriorated. One (1) drum containing flammable tetrahydrofuran was observed next to the toluene drums. The drum was visibly crushed on all sides. Wet spray paint was observed on top of the drum stating "to be re-packed". Mr. Heldt stated that the tetrahydrofuran and the toluene drums are to be sent off-site for disposal.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) Copy Mailed To Facility

Date

Inspector (signature) [Signature]

Date

3/28/2007

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of inspection 03 - 21 - 2007 Identification Number PAD982363889Company/Facility/Site Name Norquay Technology Incorporated

Using drums unsuitable for hazardous waste containment is **contrary to 40 CFR 265.171**. The area outside of the staging area in the production room had standing pools of water collecting underneath raw material drums. The water has collected as a result of the roof leaking. It is strongly recommended that the actions continue to be pursued to correct this deficiency. Additionally, action should be taken to ensure that containers holding chemicals that are incompatible with water be moved from areas where the roof leaks.

The hazardous waste storage area contained nine (9) drums of waste with a hazardous waste label indicating contents of waste flammable liquids N.O.S. (toluene, acetone, xylene). The drums are placed on hazardous waste containment pallets. It was noted that all drums containing hazardous waste observed during this inspection were labeled in this manner. The facility regularly produces hazardous waste consisting of alcohol, methanol, organic solvents, and chlorinated solvents. A generic hazardous waste label indicating toluene, acetone, and xylene does not accurately identify all of the facilities waste streams **contrary to the Solid Waste Management Act 6018.403(b)(2)**. This violation was also observed during the October 12, 2006 inspection. Mr. Heldt provided an example of new chemical identification labels, which are in the process of being implemented at the facility. One of the drums of waste labeled toluene was visibly punctured and leaking into a containment pallet. Storing hazardous waste in a container that is not in good condition and leaking is **contrary to 40 CFR 265.171**. One (1) 55-gallon drum was unlabeled, deteriorating, and open. The drum exhibited substantial rust covering the entire container. Facility personnel were unable to identify the contents of the drum. Utilizing a waste container that is not in good condition to hold hazardous waste is **contrary to 40 CFR 265.171**. Having a hazardous waste container that is not closed during storage is **contrary to 40 CFR 265.173 (a)**. A hazardous waste container that is not dated or labeled is **contrary to 40 CFR 262.34 (a)(2) and 40 CFR 262.34 (a)(3)**. Eighty-eight (88) 55-gallon drums of unlabeled material are stored on wooden pallets adjacent to the hazardous waste storage area. Mr. Heldt stated that these drums are to be transported off-site for disposal. A chemical analysis should be conducted to properly identify the contents of these containers to ensure proper disposal. Unless the facility can demonstrate that materials and byproducts stored on-site are recyclable or reclaimable and have feasible means of such recycling or reclamation, such materials are wastes *per 40 CFR 261.2(c)(4)*.

The residual waste storage area is a large area consisting of the majority of the warehouse. One (1) 55-gallon drum labeled as "residual propylene glycol" was observed to be teetering on the edge of a wooden pallet. This wooden pallet was stacked on top of other residual waste drums. The area below the teetering drum contained various raw material and residual waste drums. Storage of residual waste in a manner that creates a safety risk is **contrary to PA Code 299.111(2)**.

Throughout the warehouse, rainwater from the leaking roof has mixed with substances that have been spilled to the floor from various drums or containers. Several of these areas were discolored and slippery. Once spilled to the floor, substances that are no longer capable of being used are considered wastes. Dumping or depositing or permitting the dumping or depositing of solid wastes onto the ground by any means is **contrary to the Solid Waste Management Act 6018.610(1)**. This violation was also observed during the October 12, 2006 inspection.

Heated storage for raw materials and waste that is water reactive or highly flammable is located outside of the warehouse. The storage is near the exit next to the hazardous waste storage area.

The residual waste tanks include one 5000-gallon, two 2500 gallon, and three 1000-gallon tanks. The tanks are now labeled "residual waste water" as per the recommendation from the October 17, 2006 inspection. The residual waste water is shipped via tanker truck for disposal through US Environmental (PAR000524041). The facility has repaired the leaking residual waste hose, which was leaking waste onto the steel plating. *This corrects the violations of PA Code 299.112(c) and 299.122(b)(6)*. The concrete containment beneath the residual waste tanks was tested for integrity in November of 2006.

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Person interviewed (signature) Copy Mailed To Facility

Date

Inspector (signature) [Signature]

Date

3/28/2007Page 7 of 8

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of inspection 03 - 21 - 2007 Identification Number PAD982363889Company/Facility/Site Name Norquay Technology Incorporated

Upon inspection of the "reactor room", Four (4) 55-gallon drums labeled "hazardous waste" were observed on-top of a containment pallet. The label indicated that the drums contain waste flammable liquids acetone, toluene, and xylene. Mr. Kauer explained that current processes within the reactor room would produce a toluene waste therefore there is no violation of the Solid Waste Management Act 6018.403(b)(2). The oldest drum stored in satellite accumulation was dated on March 15, 2007.

Within the facilities research and development lab, a pail of hazardous waste solvents was observed to be labeled as "organic waste". The pail was properly labeled as hazardous waste and properly described. However, the label used to identify the waste was white. The facility uses yellow hazardous waste labels on all other hazardous waste drums. It is recommended that the facility use a yellow hazardous waste label in the laboratory to remain consistent.

The most recent hazardous waste shipment dated March 20, 2007 included eighty-eight (88) 55-gallon drums of hazardous waste. The shipment totaled 4752 gallons. The shipment consisted of hazardous waste described as waste flammable liquids (acetone, toluene, and xylene) with EPA waste codes D001, F003, F005.

The residual waste biennial report for 2006 was submitted to the Department on February 26, 2006. A written source-reduction strategy (25R) was available on-site. A chemical analysis (26R) was submitted to the Department on February 28, 2006. *This corrects the violations of PA Code 287.52, PA Code 287.54, and PA Code 287.53.*

9 violations noted.

Within fourteen (14) days of the receipt of this report, Norquay Technology Inc should submit to the Department a schedule and plan detailing what actions the facility intends to take to correct and prevent the violations noted.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

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Person interviewed (signature) Copy Mailed To Facility

Date

Inspector (signature) [Signature]

Date

3/28/2007

EPA

March 2006

RCRAInfo CM&E EVALUATION – VIOLATION FORM

*EPA ID Number		PAD982363889		EIN			
Handler Name		Norgway Technology Inc					
Street		800 W Front St					
City		Chester		State		PA	
				Zip Code		19013	
Actual Generator Status				LQG <input type="checkbox"/> SQG <input type="checkbox"/> CESQG <input type="checkbox"/> Closed <input type="checkbox"/> Non-Handler <input type="checkbox"/>			
Check only if different from Notified Status.							
Universe Change Required? (Generator Status Change Required)		YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> If YES, complete the Universe Change Section (on reverse side of this form).					
RCRA Non-Notifier?		YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> If YES, complete the Handler Section (on reverse side of this form).					
Other Facility Information Changes?		YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> If YES, complete the Handler Section (on reverse side of this form).					
*EVALUATION		<input checked="" type="checkbox"/> Add <input type="checkbox"/> Update <input type="checkbox"/> Delete		You must provide an Evaluation Identifier (also known as the Sequence Number).			
*Evaluation Identifier	*Type	*Evaluation Start Date (mm/dd/yyyy)	*Agency	Responsible Person		Suborganization	
001	CEI	10/12/2006	S	AWS		WMA	
Day Zero (mm/dd/yyyy): You need to specify Day Zero for all evaluation types except CDI, CSE, FUI, SNY, and SNN, otherwise it defaults to Evaluation Start Date. For CDI, CSE, FUI, and SNY evaluations, you must select a previous CEI Start Date for the Day Zero. SNN evaluation type does not require a Day Zero.			10/12/06		Reclassified SV Date: Only applicable for SNY evaluation type as appropriate.		
Notes: Hazardous + residual waste violations noted							
Evaluation Indicator Field (Check all that apply)							
<input type="checkbox"/> Citizen Complaint <input type="checkbox"/> Multimedia Inspection <input type="checkbox"/> Sampling <input type="checkbox"/> Not Subtitle C							
Focused Coverage Areas (Use Only for Evaluation Type FCI)							
Regulation-Specific FCI							
BIF <input type="checkbox"/> CCI <input type="checkbox"/> CFI <input type="checkbox"/> INC <input type="checkbox"/> LDR <input type="checkbox"/> PTB <input type="checkbox"/> PTX <input type="checkbox"/>							
THI <input type="checkbox"/> UIC <input type="checkbox"/> UOI <input type="checkbox"/> UWR <input type="checkbox"/> OTHER (specify): _____							
Routine/Standardized FCI							
CAR <input type="checkbox"/> CPC <input checked="" type="checkbox"/> DOS <input type="checkbox"/> EMR <input type="checkbox"/> IEI <input type="checkbox"/> ISI <input type="checkbox"/> RTI <input type="checkbox"/>							
Does this Evaluation Add/Update/Delete a Violation?		YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>		If Yes, fill in the Violations Section(s) on page 2 of this form.			
Does this Evaluation link to a Commitment?		YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>		If Yes, please use the RCRAInfo 3007 Information Requests and Commitments Form.			
Does this Evaluation link to a 3007 Request?		YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>		If Yes, please use the RCRAInfo 3007 Information Requests and Commitments Form.			
OUTSTANDING VIOLATIONS COVERED BY ABOVE EVALUATION?		YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>		If Yes, fill in information below.			
*Seq. No.	*Violation Type	*Agency	*Regulation Citation (Type + Citation) (ex. FR 262.1)		*Date Determined (mm/dd/yyyy)		

*Required Fields

1R

EPA ID Number			Handler Name		
PAD982363889			Norquay Technology Inc		
VIOLATIONS SECTION					
(Additional Violations can be added/updated/deleted using the RCRAInfo CM&E Additional Violations Form)					
VIOLATION <input checked="" type="checkbox"/> Add <input type="checkbox"/> Update <input type="checkbox"/> Delete				Link to Above Evaluation <input checked="" type="checkbox"/>	
Seq. No	Violation Type	Agency	Determined Date (mm/dd/yyyy)	Return to Compliance (RTC) Qualifier	Actual RTC Date (mm/dd/yyyy)
	262.C	S	10/12/2006	<input type="checkbox"/> A RTC Qualifier is required if entering an Actual RTC Date.	10/17/2006
Notes: Haz waste satellite accumulation labeling cited + later corrected					
LINK CITATIONS TO ABOVE VIOLATION?			YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	If Yes, fill in information below	
Citation Type	Citation		Citation Type	Citation	
FR	40 CFR 262.34(c)(1)(i)				
VIOLATION <input checked="" type="checkbox"/> Add <input type="checkbox"/> Update <input type="checkbox"/> Delete				Link to Above Evaluation <input checked="" type="checkbox"/>	
Seq. No	Violation Type	Agency	Determined Date (mm/dd/yyyy)	Return to Compliance (RTC) Qualifier	Actual RTC Date (mm/dd/yyyy)
	XXS	S	10/12/2006	<input type="checkbox"/> A RTC Qualifier is required if entering an Actual RTC Date.	
Notes: Generic haz waste DOT label used (preprinted) without accurately ID contents					
LINK CITATIONS TO ABOVE VIOLATION?			YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	If Yes, fill in information below	
Citation Type	Citation		Citation Type	Citation	
SS	SWMA 6018.403(b)(2)				
HANDLER SECTION (Fill out if RCRA Non-Notifier)					
Handler Name		Contact			
Street					
City		State	Zip Code		
County					
UNIVERSE CHANGE SECTION (Fill out if Universe Change Required)					
i. Indicate the Facility's current Universe(s):					
ii. Indicate the new RCRAInfo Generator Universe: Note: All TSD activity changes must be handled by the IOR and cannot be made using this form.			LQG <input type="checkbox"/> Non-Handler <input type="checkbox"/>	SQG <input type="checkbox"/> Closed <input type="checkbox"/>	CEG <input type="checkbox"/>
iii. Indicate the new transporter status: (Only fill out if the facility requires a transporter status change)		Transporter <input type="checkbox"/> If the transporter box is checked, you must check at least one mode of transportation below. <input type="checkbox"/> Air <input type="checkbox"/> Water <input type="checkbox"/> Rail <input type="checkbox"/> Other <input type="checkbox"/> Highway		Non-Transporter <input type="checkbox"/> Check non-transporter if the facility is currently listed in RCRAInfo as a transporter AND no longer transports hazardous waste.	

*Required Fields

RCRAINFO CM&E ADDITIONAL VIOLATIONS FORM

(Attach to RCRAInfo CM&E Evaluation – Violation Form, if appropriate)

EPA ID Number	Handler Name
PAD982363889	Norquay Technology Inc

VIOLATION	<input checked="" type="checkbox"/> Add	<input type="checkbox"/> Update	<input type="checkbox"/> Delete	Link to Above Evaluation <input checked="" type="checkbox"/>
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Seq. No	Violation Type	Agency	Determined Date (mm/dd/yyyy)	Return to Compliance (RTC) Qualifier	Actual RTC Date (mm/dd/yyyy)
	XXS	S	10/12/2006	<input type="checkbox"/> A RTC Qualifier is required if entering an Actual RTC Date.	

Notes: Various materials spilled from containers of commercial product + intermediates

LINK CITATIONS TO ABOVE VIOLATION?	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>	If Yes, fill in information below
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Citation Type	Citation	Citation Type	Citation
SS	SWMA 6018.610(1)		

VIOLATION	<input checked="" type="checkbox"/> Add	<input type="checkbox"/> Update	<input type="checkbox"/> Delete	Link to Above Evaluation <input checked="" type="checkbox"/>
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Seq. No	Violation Type	Agency	Determined Date (mm/dd/yyyy)	Return to Compliance (RTC) Qualifier	Actual RTC Date (mm/dd/yyyy)
	265.I	S	10/12/2006	<input type="checkbox"/> A RTC Qualifier is required if entering an Actual RTC Date.	

Notes: Several weekly inspections omitted from the inspection log on-site

LINK CITATIONS TO ABOVE VIOLATION?	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>	If Yes, fill in information below
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Citation Type	Citation	Citation Type	Citation
FR	40 CFR 265.174		

VIOLATION	<input checked="" type="checkbox"/> Add	<input type="checkbox"/> Update	<input type="checkbox"/> Delete	Link to Above Evaluation <input checked="" type="checkbox"/>
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Seq. No	Violation Type	Agency	Determined Date (mm/dd/yyyy)	Return to Compliance (RTC) Qualifier	Actual RTC Date (mm/dd/yyyy)
0014	265.B	S	10/12/2006	<input type="checkbox"/> A RTC Qualifier is required if entering an Actual RTC Date.	

Notes: Haz mat training insufficient

LINK CITATIONS TO ABOVE VIOLATION?	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>	If Yes, fill in information below
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Citation Type	Citation	Citation Type	Citation
FR	40 CFR 265.16(a)(1)		



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection Date 10/12+17/2006

Time Start _____

Time Finish _____

HAZARDOUS WASTE INSPECTION REPORT☒ **GENERATOR**☐ **S Q GENERATOR**

Company name Norquay Technology Inc. I.D. Number PAD982363889
 Site Address 800 ~~East~~ West 01 Front Street Chester PA
 County Delaware Municipality Chester City Zip 19013
 Name of Inspector Andrew Sinclair, Clark Smith, Jessica Hartley, Joy Gillespie
 Name & Title of Responsible Official Mr Bob Heldt, President
 Person Interviewed SAA, Tim Kauer, Mike Sengenele Telephone (610) 874-4330
 Mailing Address (if different from above) _____
 Amount of Hazardous Waste Generated per Month: >2200 Pounds/mo Kgs

1. Site Characterization:STORAGE: ☒ Container ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad Other _____PBR: ☐ Neutralization/WWTP ☐ Reclaim Other _____GENERATOR TREATMENT ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad**2. Universal Waste:** ☐ Large Quantity Handler ☐ Small Quantity Handler

Universal Waste Types _____

3. Hazardous Waste Transporters:Transporter Name Republic Env System License Number 0317Transporter Name Nortru, Inc License Number MID021087275Transporter Name Norwith Trucks License Number PAD146714878**4. Types of hazardous waste generated and destination facility (location & type).**

Waste Code	Waste Description	Destination Facility
<u>D001, F003, F005</u>	<u>Wst Flammable Liq</u> <u>(acetone, toluene)</u>	<u>Republic Env System (PA)</u> <u>Hatfield, PA</u> <u>PAD0856990592</u>
<u>F003, F005</u>	<u>Har Wst Solid</u> <u>(acetone, xylene, toluene)</u>	<u>"</u> <u>Petro-Chem Processing</u> <u>Detroit MI</u> <u>MID021087275</u>

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name Norquay Technology Inc. ID Number PAD982363889 Date 10-12-17-2006

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Identification Number	262a.10	262.12	H002
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Authorized transporters only	262a.10	262.12(c)	H003
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Subsequent notification requirements met	262a.12(b)		H004
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Proper manifest used	262a.10	262.21	H005
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Manifests filled out correctly and completely	262a.20		H006
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Manifests signed and routed properly	262a.23(a)	262.23	H007
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Specified records retained for three years	262a.10	262.40(c)	H014
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Exception reporting procedures followed	262a.42	262.42	H016
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Spill reporting procedures followed	262a.10	262.34(d)	H017
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	PPC plan developed and implemented	262a.10	262.34(a)	H018
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Special requirements followed for international shipments	262a.10	262.50 262.60	H019
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Source reduction strategy prepared and available (LQG only)	262a.100		H020
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Excluded waste complies with exclusionary requirements	261a.4	261.4	H021
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site Name Norway Technology Inc. ID Number PAD982363889 Date 10-12-17-2006
 1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
				<u>Waste</u> CONTAINERS (Subchapter I)			
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers of hazardous waste in good condition	265a.1	265.171	H026
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers and stored waste compatible	265a.1	265.172	H027
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers managed to prevent leaks	265a.1	265.173(b)	H029
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Container storage areas inspected at least weekly	265a.1	265.174	H031
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Proper containment and collection systems in place	265a.179		H033
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Containers clearly marked with accumulation date and visible for inspection - <u>2 drums moved so as to</u>	262a.10	262.34(a)(2)	H035
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers labeled "Hazardous Waste" <u>properly marked</u>	262a.10	262.34(a)(3)	H036
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Containers labeled <u>accurately</u> identify contents	SWMA 6018.403(b) (2)		H037



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection ID _____

Field Code _____

INSPECTION REPORT – RESIDUAL WASTE GENERATOR

Site I.D.: PAD982363889Site Name: Norquay Technology IncAddress: 800 West Front StreetChester PA 19013Municipality: Chester CrtResponsible Official: Mr Bob HeldtPerson Interviewed: SAA Jim Kaur, Mike SengulInspector: Andrew Smolin Clark Smith

eFACTS ID #: PF _____ SF _____

Telephone #: 610-874-4330

Operator Name: _____

Address: _____

County: DelawareTitle: President

Title: _____

Title: _____

Inspection Date: 10/11/2006 Type: _____ No. of Violations: _____ Time: _____

Waste Description: _____ Waste Code: _____

Treatment: ☐ Yes ☐ No Type: _____Type of Storage: ☐ Containers ☐ Tanks ☐ Piles ☐ Impoundments

Disposition: Destination Facility _____

Location: _____ Type: _____

Amount Generated: _____ lb./mo.

Waste Description: _____ Waste Code: _____

Treatment: ☐ Yes ☐ No Type: _____Type of Storage: ☐ Containers ☐ Tanks ☐ Piles ☐ Impoundments

Disposition: Destination Facility _____

Location: _____ Type: _____

Amount Generated: _____ lb./mo.

Waste Description: _____ Waste Code: _____

Treatment: ☐ Yes ☐ No Type: _____Type of Storage: ☐ Containers ☐ Tanks ☐ Piles ☐ Impoundments

Disposition: Destination Facility _____

Location: _____ Type: _____

Amount Generated: _____ lb./mo.

Waste Description: _____ Waste Code: _____

Treatment: ☐ Yes ☐ No Type: _____Type of Storage: ☐ Containers ☐ Tanks ☐ Piles ☐ Impoundments

Disposition: Destination Facility _____

Location: _____ Type: _____

Amount Generated: _____ lb./mo.

2004 Residual Waste Biennial Report not completed

COMMONWEALTH OF PENNSYLVANIA
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BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of inspection 10 - 12/17 - 2006 Identification Number PAD982363889Company/Facility/Site Name Norquay Technology Inc

On October 12, 2006, Mr. Clark Smith and I (Andrew Sinclair) conducted a hazardous waste and residual waste generator inspection of Norquay Technology, Inc located at 800 W. Front St Chester, PA 19016 in Chester City, Delaware County. Additionally, Ms. Jessica Hartley and Ms. Joy Gillespie were present representing the Department's Water Quality Bureau. Mr. Jim Kauer, Production Operator, Mr. Bob Heldt, President, and Mr. Mike Sangangelo, Chemist, were present representing Norquay Technology. The Department had been alerted to conditions of the facility that were observed through an inspection by OSHA (Occupational Safety and Health Administration) and would be of interest to the Department. The inspection continued on October 17, 2006 during which paperwork was reviewed as well as several areas of the facility. This complete report was completed later due to time constraints.

Norquay Technology, Inc is a batch specialty chemical manufacturer that produces organics and their intermediates thus generating organic and aqueous waste streams.

As a result of the previous OSHA inspections, several roof repairs have been completed, however, multiple roof leaks remain to this date, and the pyrophoric chemicals have been moved to a dry separate "block house". It was indicated hazardous wastes have recently been transported from the site for proper disposal, approximately September 18, 2006.

The most recent emergency response plan (PPC plan) last revised in August of 2005 identified broadly that chemicals stored on-site consist of flammable solvents, acidic gases, liquids, and solids, pyrophorics, water-reactive materials, oxidizers, and materials with potential dermal absorption hazards. Quite recently, the facility's plant engineer left the company and employees remaining have inherited new responsibilities. Upon a brief review of the emergency response plan, several recommendations were provided such as the incorporation of the Department's 24-hr emergency phone number for the Southeast Region in the notification section, updating the emergency contact numbers such as for DELCORA, and updating the listing of employees responsible for emergency procedures such as the emergency response coordinator who is currently listed as the ex-plant engineer. On Oct 17, an October 2006 revised plan was presented including the recommended alterations. It is recommended that the PPC plan be reviewed and revised according to the Emergency Plan Guidelines that are available through the Department (via the Internet).

Mr. Kauer has been employed at the site for approximately six months however was not appropriately trained relative to the contents of the emergency response plan *per 40 CFR 265.16(b)*.

Within the hazardous waste container storage area, 38-drum were observed on containment pallets and 8-drum were observed on containment pallets under a blue tarp. It was explained that the tarp was used due to the leaking roof dripping water into the containment pallets. Each of these drums was labeled as hazardous waste containing flammable liquids of acetone, toluene and xylene. The oldest date observed on the labels was September 20, 2006. The labels of the drums were not easily visible for inspection and two specific drums were physically moved with a piece of equipment so as to demonstrate appropriate labeling. It is recommended that this indoor storage of ignitable hazardous waste be configured per container height, width and depth such that aisle spacing insures safe management and access for purposes of inspection, containment and remedial action *per PA Code 265a.173(1)*.

The area of the empty container storage was inspected. Residual materials from the drums that may potentially be hazardous wastes were observed spilled on the floor, wooden pallets and other adjacent empty drums. Standing water from the roof leaks was also observed on the floor in which some of the material mentioned was observed. This area of standing water also pooled over a manhole cover (DCE Co) for an old electrical conduit. The cover moved when weight was applied and it is unclear if any water from this area that had possibly mixed with residues from the empty container storage area has migrated into the electrical conduit access. It is recommended that the facility determine where if any migration of waste liquid is lost through this access point.

Water with hydrochloric acid from manufacturing processes is routinely generated and occasionally stored within labeled totes that

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This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) Marked to facilityDate 10-23-06Inspector (signature) Andrew L. SinclairDate 10-20-06

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of inspection 10 - 12/17 - 2006 Identification Number PAD982363889Company/Facility/Site Name Norquay Technology Inc

are dated; the oldest date observed was March 23, 2005. Additionally, one of these "totes", a plastic discolored container, was not properly labeled, thus it was assumed that it was a waste without accurate identification of the contents *contrary to the Solid Waste Management Act 6018.403(b)(2)*. Initially, it was understood that this solution stored within these containers was an acidic wastewater, however, upon further discussions on October 17, it was explained that recoverable product remained in solution until it is neutralized (REMCO room). Once neutralized and product is recovered, the resultant residual wastewater is piped through several tanks within the room with the glycol chilling area and then to "residual waste" labeled tanks. The residual waste tanks include one 5000-gallon, two 2500-gallon and three 1000-gallon tanks. The residual waste water is shipped via tanker truck for disposal through US Environmental (PAR000524041).

The residual waste tanks were more closely inspected on October 17. It is recommended that the stenciled "residual waste" include "water" so as to ensure an improved description. On Oct. 17, one tank was in the process of being filled and the hose was leaking the waste onto the steel plating covering the below ground cement vault serving as containment. The facility did not immediately take necessary corrective actions when the equipment failed **contrary to PA Code 299.112(c) and 299.122(b)(6)**. The residual waste storage areas, equipment, and surrounding area should be routinely inspected and the relative inspections and corrective actions be retained *per PA Code 299.112(c)*. Additionally on Oct 17, a glycol/water/steam tank spewed its solution into the tanks containment from the top connection as well as outside of the containment. Below this tank is steel plating with holes. The operator of the area was unaware about what was under the plating. It is assumed it is another cement vault.

The facility is not aware of the most recent time the integrity of the containment beneath the residual waste tanks was last determined. It is undetermined whether the containment provided meets design standards and it is requested that the facility provide documentation as such. Waste was actively entering the containment as well as rain water from the leaking roof. Wastes and storm water should be removed as soon as possible. The single concrete block berm around the tank containment area appeared deteriorated relative to the sealing of the block ensuring containment. It was estimated that the containment may capture approximately 7,000-gallons.

Within the facility's research and development lab, a jar of hazardous waste solvents with a near illegible label of "organic waste" was observed. Within the QC lab, a clear jar of hazardous waste solvents was not properly labeled. These satellite accumulation storage containers were not properly labeled as "hazardous waste" or such that the contents are accurately identified **contrary to 40 CFR 262.34(c)(1)(ii)**. On Oct 17, the un-labeled jar of hazardous waste was removed and a new hazardous waste identifying label for the "organic waste" was observed on the container used in the QC lab thus correcting the violations.

The hazardous wastes from the laboratories are stored within hazardous waste containers over containment pallets within the "reactor room". These hazardous waste drums were labeled as containing acetone and toluene. However, the hazardous wastes from the laboratories consist of alcohols, methanol, as well as other organic waste solvents, and chlorinated solvents. The labels used do not accurately identify the hazardous wastes stored, particularly considering the vast variety of materials within the facility, **contrary to the Solid Waste Management Act 6018.403(b)(2)**. A labeled (toluene, acetone) drum of hazardous waste solid dated 9-22-2006 was additionally observed stored on the same containment pallet within the "reactor room". Waste PPE is stored within this drum as well as other hazardous waste solids.

On Oct 17, the zipper drains and the separate sump blocked from the zipper drains were full of a light brown liquid. It is understood that this waste liquid is transferred to the residual waste tanks as well as residual waste water from cleaning the floor after rain events. There is no discharge to DELCORA outside of sanitary wastes.

Throughout the facility in several areas of the warehouse, rainwater from the leaking roof has mixed with substances that had been spilled to the floor from various drums or containers. Several of these areas were discolored and slippery. Once spilled to the floor, such

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Person interviewed (signature) Marked to facilityDate 10-23-06Inspector (signature) Andrew L. SmithDate 10-20-06

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of inspection 10 - 12/17 - 2006 Identification Number PAD982363889Company/Facility/Site Name Norquay Technology Inc

substances no longer capable of being used and thus are wastes. Dumping or depositing or permitting the dumping or depositing of solid wastes onto the ground by any means is **contrary to the Solid Waste Management Act 6018.610(1)**.

The waste oil drum is labeled as a hazardous waste containing toluene, acetone, and xylene with the consistently used yellow pre-printed label. It is recommended that the facility reevaluate the management of the waste oil if the waste oil is not contaminated from the various solvents on-site or other hazardous constituents so as to potentially manage this waste stream as a residual waste.

On Oct 17, it was explained that the on-site fire extinguishers were just inspected for service tags and that in the future all extinguishers will be inspected monthly. Mr. Heldt stated that the facility has removed 108-drums and continues to reduce material storage as well as increase the processing of stored materials containing product in solution. Mr. Heldt stated that questionable containers have been placed over containment pallets until over-packs were obtained and used for such containers of lost integrity.

Unless the facility can demonstrate that materials and byproducts stored on-site are potentially recyclable or reclaimable and have a feasible means of such recycling or reclamation, such materials are wastes *per 40 CFR 261.2(c)(4)*.

The most recent hazardous waste shipment dated September 19, 2006 included 84-drums of hazardous waste liquids and 5-drums of hazardous waste solid. The copy of the manifest from the designated facility indicating acceptance for proper disposal is soon due (35-days). The previous shipment of hazardous waste occurred on June 6, 2006 consisting of 79-drums of hazardous waste liquids and 3-drums of hazardous waste solid. A copy of the electronic submission of the 2005 Hazardous Waste Biennial Report was provided. Records of the weekly hazardous waste storage inspection were reviewed, however, records of inspection between May 26 and June 9 and between June 23 and July 21, 2006 were not observed **contrary to 40 CFR 265.174**.

The facility had not demonstrated that appropriate employees are properly trained so as to address potential emergency situations including the Emergency Response Coordinator's responsibilities as well as an understanding of the current emergency response plan **contrary to PA Code 265.16**. The plan itself had indicated that annual training and testing was to be conducted and the employees were unable to recall when this most recently occurred.

The residual wastewater totaling 6500-gallons was last transported off-site through US Environmental to Environmental Recovery Corp located in Lancaster, PA on October 17, 2006. The facility is a large quantity generator of residual waste.

The facility has not submitted the 2004 Residual Waste Biennial Report and annual chemical analysis and relative certifications (26Rs), nor has the facility written a source reduction strategy (25Rs) for each waste stream **contrary to PA Code 287.52, PA Code 287.54, and PA Code 287.53, respectively**.

Within fourteen (14) days of the receipt of this report, Norquay Technology Inc should submit to the Department a schedule and plan detailing what actions the facility intends to take to correct and prevent the violations noted.

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Person interviewed (signature) marked to facilityDate 10-23-06Inspector (signature) Robert J. SedoreDate 10-20-06



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

 Insp # 1524824
 Inspection Date 3/28/06

Time Start _____

Time Finish _____

HAZARDOUS WASTE INSPECTION REPORT



GENERATOR



S Q GENERATOR

Company name NORQUAY TECHNOLOGY I.D. Number PAD982363889Site Address RIVERBRIDGE IND CTR, CHESTER, PACounty DelawareMunicipality City of Chester

Zip _____

Name of Inspector Paul JardelName & Title of Responsible Official Rick Ettenger - Facility EngineerPerson Interviewed SAATelephone (610) 874-4330Mailing Address (if different from above) P.O. Box 468, Chester PA 19016-0468Amount of Hazardous Waste Generated per Month: >2200 Pounds _____ Kgs _____

1. Site Characterization:

STORAGE: ☒ Container ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad Other _____PBR: ☐ Neutralization/WWTP ☐ Reclaim Other _____GENERATOR TREATMENT ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad2. Universal Waste: ☐ Large Quantity Handler ☒ Small Quantity HandlerUniversal Waste Types Hg lamps, devices

3. Hazardous Waste Transporters:

Transporter Name Horwith Trucks License Number AH-0176Transporter Name Republic Env systems License Number AH-0317

Transporter Name _____ License Number _____

4. Types of hazardous waste generated and destination facility (location & type).

Waste Code	Waste Description	Destination Facility
D001, D038, F003-5	Solvents and solid wastes	EQ RR, Romulus MI
D001		Petro-Chem, Detroit MI

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name NORQUAY TECHNOLOGY ID Number PAD982363889 Date 3/28/06

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Identification Number	262a.10	262.12	H002
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Authorized transporters only	262a.10	262.12(c)	H003
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Subsequent notification requirements met	262a.12(b)		H004
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Proper manifest used	262a.10	262.21	H005
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Manifests filled out correctly and completely	262a.20		H006
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Manifests signed and routed properly	262a.23(a)	262.23	H007
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Specified records retained for three years	262a.10	262.40(c)	H014
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Exception reporting procedures followed	262a.42	262.42	H016
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Spill reporting procedures followed	262a.10	262.34(d)	H017
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	PPC plan developed and implemented	262a.10	262.34(a)	H018
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Special requirements followed for international shipments	262a.10	262.50 262.60	H019
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Source reduction strategy prepared and available (LQG only)	262a.100		H020
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Excluded waste complies with exclusionary requirements	261a.4	261.4	H021
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site Name NORQUAY TECHNOLOGY ID Number PAD982363889 Date 3/28/06

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
				CONTAINERS (Subchapter I)			
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers of hazardous waste in good condition	265a.1	265.171	H026
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers and stored waste compatible	265a.1	265.172	H027
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers managed to prevent leaks	265a.1	265.173(b)	H029
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Container storage areas inspected at least weekly	265a.1	265.174	H031
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Proper containment and collection systems in place	265a.179		H033
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers labeled accurately identify contents	SWMA 6018.403(b) (2)		H037

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HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site Name NORQUAY TECHNOLOGY ID Number PAD982363889 Date 3/28/06

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
				LQG TANKS (Subchapter J)			
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Tanks labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H040
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Written certification by registered professional engineer for proper tank (system) design and installation on file	262a.10	265.192(a)	H041
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Secondary containment provided for tanks (systems) as required	265a.193	265.193	H042
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Tanks (systems) managed to prevent rupture, leak, corrode or fail	265a.1	265.194	H043
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Tanks labeled to accurately identify contents	265a.194		H044
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Required inspections completed and documented in operating log	265a.195	265.195	H045
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Release reported to Department within 24 hours, unless exempted	265a.1	265.196	H046
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Special requirements for ignitable and reactive wastes followed	265a.1	265.198	H047
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Special small quantity generator requirements	265a.1	265.201	H048
				SQG TANKS			
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Waste contents compatible with tank	265a.1	265.201(b)(2)	H051
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Uncovered tanks operated with 2 feet of freeboard or equivalent containment capacity	265a.1	265.201(b)(3)	H052
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	If continuously fed, tank has method to stop inflow	265a.1	265.201(b)(4)	H053
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Daily tank inspection requirements complied with	265a.1	265.201(c)(1-3)	H054
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Weekly tank inspection requirements complied with	265a.1	265.201(c)(4,5)	H055
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	All waste removed at closure	265a.1	265.201(d)	H056
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Special requirements for ignitable or reactive waste complied with	265a.1	265.201(e)(1)	H057
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Covered tank buffer zone requirements complied with	265a.1	265.201(e)(2)	H058
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Incompatible waste requirements met	265a.1	265.201(f)	H059

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of inspection 3/28/06 ID Number PAD982363889Company/Facility/Site Name Norquay Technology Inc.

This routine hazardous waste large quantity generator inspection of the above facility was done by Department Solid Waste Specialist Paul Jardel along with Mr. Rick Ettenger, Norquay facility engineer. The facility continues to manufacture specialty chemical products and intermediates. Part of the company business has been taken over by W.R. Grace. Although a number of related separate concerns are run at the site, all waste is managed under the Norquay name.

The 55 gallon satellite accumulation drum of hazardous waste vacuum pump oil was properly closed and identified. The lab area satellite organic solvent waste drum was in compliance. All satellite area containers were provided some sort of secondary containment. The reactor room 90-day storage area containment pallets held 5 drums of liquid solvent waste and one drum of solid hazardous waste. All containers were properly labeled and closed. Secondary containment records for both the main storage area and the reactor room were complete.

The maintenance area has an empty parts cleaner that has not been used for some time and also a bead blaster that is located near the facility boiler. The facility manages the waste grit as hazardous waste due to possible waste residue drag out.

The main hazardous waste storage area, located at the rear of the warehouse, near the loading dock, held app. 58 drums of hazardous waste. All were properly labeled, closed and provided secondary containment.

A 500 ml Nalgene bottle staged in the lab held universal waste elemental Mercury generated from two thermometer breakage incidents. The container was properly identified during the inspection. Waste fluorescent lamps are segregated and placed into an appropriately labeled box located in the second floor storage loft. No batteries are generated since the facility fork lifts are leased.

Reviewed 2005 and 2006 manifests indicate that the facility is properly classified as a large quantity generator. All manifests were executed properly.

The 2005 Hazardous Waste Biennial Report was submitted. The report states that the facility generates D021 and D028 in addition to the routine waste streams. These codes are not reflected elsewhere in the report. In addition an incident involving a drum of Propionyl chloride that subsequently generated D001, D002 and D003 waste was not reflected in the waste code section (section 11) of the report.

The facility Source Reduction Strategy is current. A 2004 letter to the DEP stated that the plan details would be developed. The facility should state any recent source reduction initiatives since the current plan is not detailed enough.

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Person interviewed (signature) Copy mailed to facility Date 3/28/06Inspector (signature) _____ Date 3/28/06

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of inspection 3/28/06 ID Number PAD982363889Company/Facility/Site Name Norquay Technology Inc.

Employee training is current. The training was provided in 3/06.

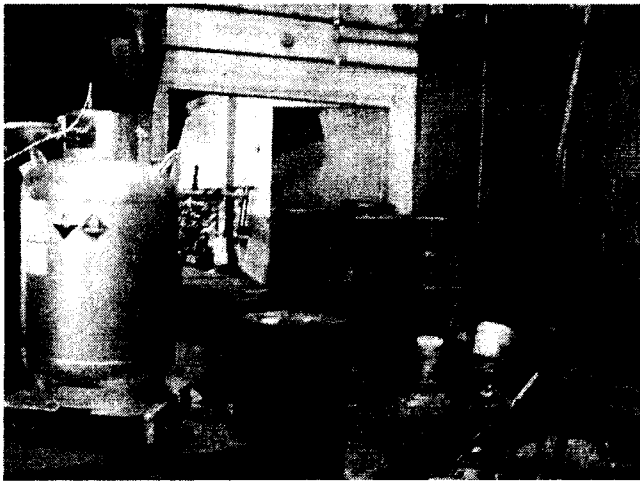
The current facility Emergency Response Plan (PPC Plan) was last reviewed in 8/2005. No deficiencies were observed.

The facility process residual wastewater is collected in a number of AST's and undergoes pH correction prior to tanker shipment offsite. **As stated during the last inspection, the AST's should be labeled according to 299.122(a) and provided secondary containment (299.122(b)). This should be done in order to avoid a residual waste violation.**

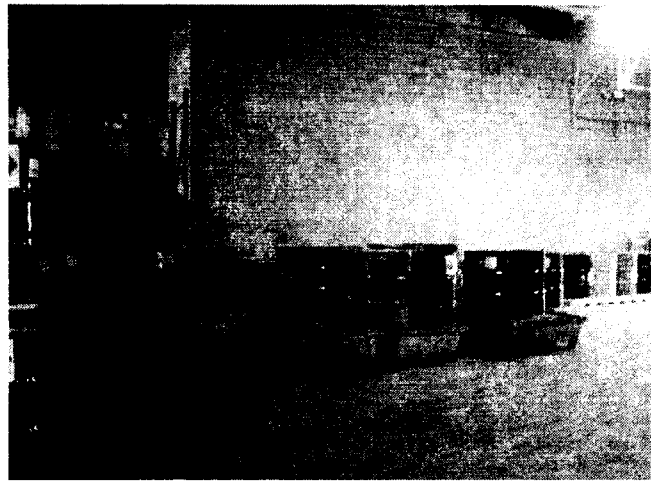
It is also possible that the facility will be subject to the residual waste permit by rule provisions of 287.102 since it carries out wastewater pretreatment. This will be investigated.

There is no longer a drain rack for the empty drums. The containers are emptied to the greatest extent and sent offsite to the recycler.

Nothing else was observed during this inspection.



Reactor room secondary containment



Warehouse 90 day storage area.

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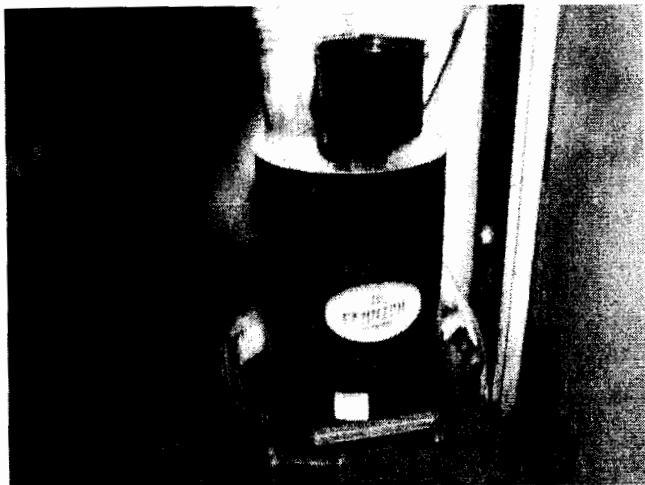
Person interviewed (signature) Copy mailed to facility Date 3/28/06Inspector (signature) [Signature] Date 3/28/06

COMMONWEALTH OF PENNSYLVANIA
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BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of inspection 3/28/06 ID Number PAD982363889

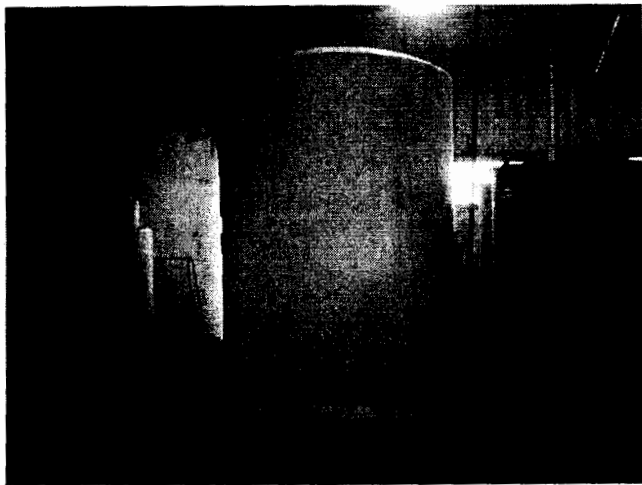
Company/Facility/Site Name Norquay Technology Inc.



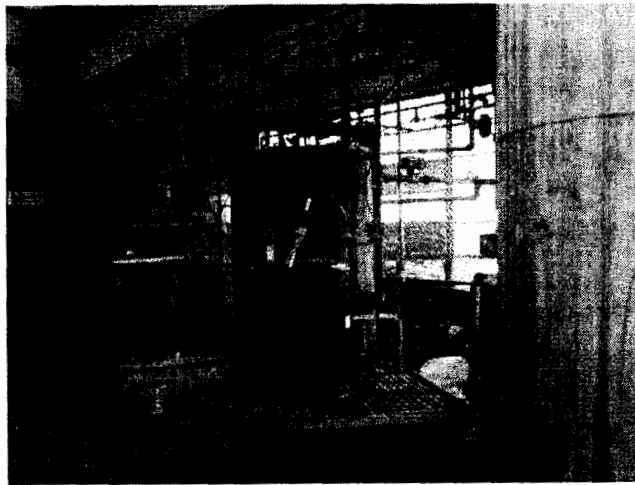
Pump oil satellite accumulation area



Empty drums



Treated waste water storage tanks



pH adjustment tank in the background.

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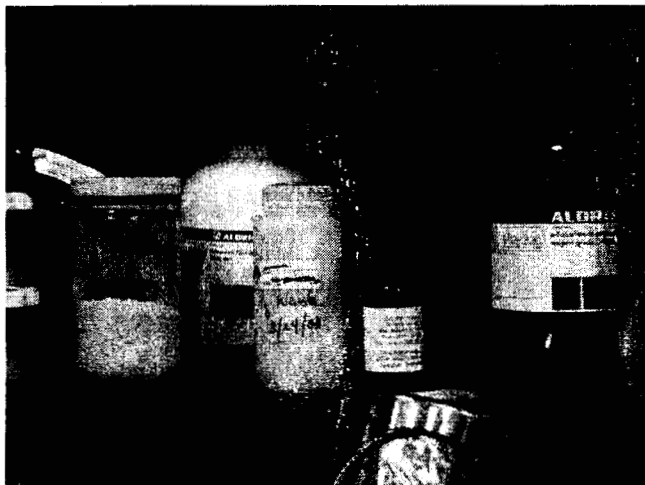
Inspector (signature) _____ Date 3/28/06

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of inspection 3/28/06 ID Number PAD982363889

Company/Facility/Site Name Norquay Technology Inc.



Universal waste Mercury



Bead blaster



Lab satellite area

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Inspector (signature) _____ Date 3/28/06

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site Name no reply ID Number PA0982363889 Date 7/12/02

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
				CONTAINERS (Subchapter I)			
X				Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
X				Containers of hazardous waste in good condition	265a.1	265.171	H026
X				Containers and stored waste compatible	265a.1	265.172	H027
X				Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
X				Containers managed to prevent leaks	265a.1	265.173(b)	H029
X				Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
	X			Container storage areas inspected at least weekly	265a.1	265.174	H031
X				Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
X				Proper containment and collection systems in place	265a.179		H033
X				Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
X				Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
X				Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
	X			Containers labeled accurately identify contents <i>See comments</i>	SWMA 6018.403(b) (2)		H037



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection Date 7/12/00
Time Start _____
Time Finish _____

HAZARDOUS WASTE INSPECTION REPORT

☒ GENERATOR ☐ S Q GENERATOR

Company name Norquay Technology I.D. Number PA0982363889
Site Address Riverbridge Industrial Center, Front + Lloyd Sts., Chester PA
County Delaware Municipality Chester City Zip 19016
Name of Inspector Paul Tardel, James Grabusky
Name & Title of Responsible Official Dave Potter, Engineer
Person Interviewed SAA Telephone (610) 874-4330
Mailing Address (if different from above) _____
Amount of Hazardous Waste Generated per Month: > 2200 Pounds _____ Kgs

1. Site Characterization:

STORAGE: ☒ Container ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad Other _____
PBR: ☐ Neutralization/WWTP ☐ Reclaim Other _____
GENERATOR TREATMENT ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad

2. Universal Waste: ☐ Large Quantity Handler ☐ Small Quantity Handler

Universal Waste Types not det'd

3. Hazardous Waste Transporters:

Transporter Name _____ License Number _____
Transporter Name _____ License Number _____
Transporter Name _____ License Number _____

4. Types of hazardous waste generated and destination facility (location & type).

Waste Code	Waste Description	Destination Facility

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name Morgue ID Number PA0982363889 Date 7/12/00

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
<input checked="" type="checkbox"/>				Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
<input checked="" type="checkbox"/>				Identification Number	262a.10	262.12	H002
<input checked="" type="checkbox"/>				Authorized transporters only	262a.10	262.12(c)	H003
<input checked="" type="checkbox"/>				Subsequent notification requirements met	262a.12(b)		H004
	<input checked="" type="checkbox"/>			Proper manifest used	262a.10	262.21	H005
		<input checked="" type="checkbox"/>		Manifests filled out correctly and completely	262a.20		H006
		<input checked="" type="checkbox"/>		Manifests signed and routed properly	262a.23(a)	262.23	H007
<input checked="" type="checkbox"/>				Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
<input checked="" type="checkbox"/>				SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
	<input checked="" type="checkbox"/>			SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
<input checked="" type="checkbox"/>				Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
	<input checked="" type="checkbox"/>			Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
	<input checked="" type="checkbox"/>			Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
		<input checked="" type="checkbox"/>		Specified records retained for three years	262a.10	262.40(c)	H014
		<input checked="" type="checkbox"/>		Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
		<input checked="" type="checkbox"/>		Exception reporting procedures followed	262a.42	262.42	H016
		<input checked="" type="checkbox"/>		Spill reporting procedures followed	262a.10	262.34(d)	H017
		<input checked="" type="checkbox"/>		PPC plan developed and implemented	262a.10	262.34(a)	H018
		<input checked="" type="checkbox"/>		Special requirements followed for international shipments	262a.10	262.50 262.60	H019
		<input checked="" type="checkbox"/>		Source reduction strategy prepared and available (LQG only)	262a.100		H020
		<input checked="" type="checkbox"/>		Excluded waste complies with exclusionary requirements	261a.4	261.4	H021

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of inspection 7/12/00 ID Number PAD982363889Company/Facility/Site Name Norquay Technology Inc.

This waste generator inspection of the above facility was done by Department WMS Paul Jardel and EPS James Grabusky along with Norquay Engineer Mr. David Potter.

This inspection was to determine the status of containers observed in the facility warehouses that were to beginning to be inventoried and segregated by Norquay after years of storage.

The drums of hazardous waste staged on portable spill containment pallets had proper labeling and adequate aisle spacing to allow for inspection.

The vast majority of containers in the new warehouse have been investigated, labeled and segregated into like groups. These are presently being evaluated as to whether they can be used or must be disposed of.

Standing water was observed in the alleyway adjacent to PQ. A hose was observed running through the wall of the room holding the wastewater tank and terminating next to the wastewater pit. It was evident from streaks on the ground that there had been a recent discharge from the pit. The hose was there to wash the waste water into a nearby drain. It was not clear where the drain goes. Mr. Potter stated that he did not know when or how the pit overflowed, but stated that the pit is scheduled to be upgraded. This report will be forwarded to Richard Breitenstein of DEP Water Management.

A sump pump transferring waste water from a pump pit into an unknown nearby drain was investigated. Mr. Potter stated that this was done by the industrial park (Riverbridge assoc.) and not Norquay. Samples were collected from the hope and the drain. The matter will be followed up by Jim Grabusky.

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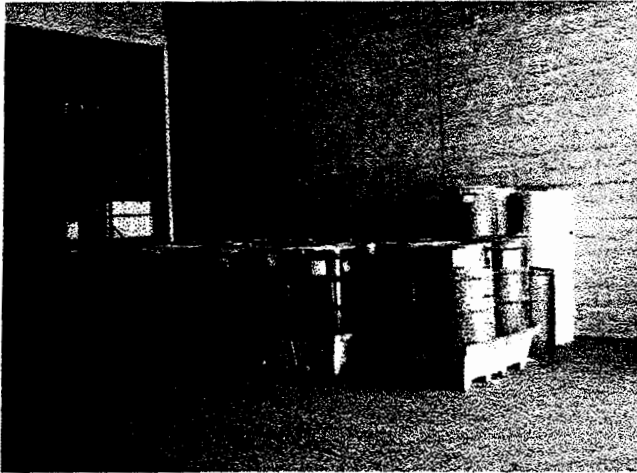
Person interviewed (signature) _____ Copy mailed to facility _____ Date 7/14/00Inspector (signature) cont'd on next page Date _____

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of inspection 7/12/00 ID Number PAD982363889

Company/Facility/Site Name Norquay Technology Inc.



Drums of HW in containment



Wastewater pit overflow

No violations were observed during this inspection.

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Inspector (signature) *[Signature]* Date 7/20/00



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection Date 06/23/99 LE FF

Time Start _____

Time Finish _____

HAZARDOUS WASTE INSPECTION REPORT



GENERATOR



S Q GENERATOR

Company name Norquay Technology Inc. I.D. Number PAS982363889

Site Address Riverbridge Industrial Center, Front + Lloyd Sts., Chester, PA

County Delaware Municipality Chester City ZIP 19016

Name of Inspector Paul Tardel

Name & Title of Responsible Official David Potter

Person Interviewed SHA Telephone (610) 874-4330

Mailing Address (if different from above) _____

Amount of Hazardous Waste Generated per Month: _____ Pounds 71000 Kgs

1. Site Characterization:

STORAGE: ☒ Container ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad Other _____

PBR: ☐ Neutralization/WWTP ☐ Reclaim Other _____

Generator Treatment ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad

2. Universal Waste: ☐ Large Quantity Handler ☐ Small Quantity Handler

Universal Waste Types not detail

3. Hazardous Waste Transporters:

Transporter Name See 11/98 Insp. License Number _____

Transporter Name _____ License Number _____

Transporter Name _____ License Number _____

4. Types of hazardous waste generated and destination facility (location & type).

Waste Code	Waste Description	Destination Facility
	<u>See 11/98 Insp.</u>	

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of inspection 6/23/99 ID Number PAD982363889Company/Facility/Site Name Norquay Technology Inc.

This hazardous waste generator follow up inspection of the above facility was done by Department WMS Paul Jardel along with Mr. David Potter, Norquay Engineer. During this inspection the following was observed:

The completed facility Emergency Response Plan was viewed. A copy of the plan was given to this inspector.

The main hazardous waste storage area contained over 40 drums staged on portable containment pallets. Aisle space was available to inspect the drums in compliance with. The aisle spacing requirements of 265a.175 should be noted.

The facility is now keeping a weekly secondary containment inspection logbook. A separate entry should be made for each of the two containment areas.

A copy of the May 1, 1999 PA Bulletin, containing the PA hazardous waste regulations was sent to the facility.

No violations were observed during this inspection.

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COMMONWEALTH OF PENNSYLVANIA
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BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection Date 06/23/99
Time Start _____
Time Finish _____

HAZARDOUS WASTE INSPECTION REPORT
☒ **GENERATOR** ☐ **S Q GENERATOR**

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Site Address Riverbridge Industrial Center, Front + Lloyd Sts., Chester, PA
County Delaware Municipality Chester City ZIP 19016
Name of Inspector Paul Tardel
Name & Title of Responsible Official David Potter
Person Interviewed SA Telephone (610) 874-4330
Mailing Address (if different from above) _____
Amount of Hazardous Waste Generated per Month: _____ Pounds 71000 Kgs

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Universal Waste Types not detail

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Transporter Name See 11/98 Insp. License Number _____
Transporter Name _____ License Number _____
Transporter Name _____ License Number _____

4. Types of hazardous waste generated and destination facility (location & type).

Waste Code	Waste Description	Destination Facility
	<u>See 11/98 Insp.</u>	

COMMONWEALTH OF PENNSYLVANIA
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